

EXHIBIT

O

Shelly Bloor

From: Will Cochran
Sent: Wednesday, February 26, 2020 4:52 PM
To: Chris Williams
Subject: FW: Depositions of the named Plaintiffs/Scheduling Order

From: MMclaren <MMclaren@blackmclaw.com>
Sent: Monday, January 27, 2020 1:12 PM
To: Frank Watson <fwatson@watsonburns.com>; Horton, Odell <ohorton@wyattfirm.com>
Cc: Brice Timmons <btimmons@blackmclaw.com>; Will Cochran <wcochran@blackmclaw.com>; Will Routt <wroutt@watsonburns.com>; Bill Burns <bburns@watsonburns.com>; btrammell@bakerdonelson.com; Craddock, Bob <rcraddock@wyattfirm.com>
Subject: RE: Depositions of the named Plaintiffs/Scheduling Order

Thanks, Odell. Please just give me dates for Raper, individual, shouldn't be that hard.

Michael G. McLaren
BLACK McLAREN JONES RYLAND & GRIFFEE, P.C.
530 OAK COURT DRIVE, SUITE 360
MEMPHIS, TN 38117
Telephone (901) 762-0535
Facsimile (901) 762-0539
email:mmclaren@blackmclaw.com

The information contained in this email is legally privileged and confidential information intended solely for the use of the person named above. If the reader of this email is not the intended recipient, you are notified that any use, dissemination, distribution or copying of this email or its contents is strictly and absolutely prohibited.

From: Frank Watson <fwatson@watsonburns.com>
Sent: Monday, January 27, 2020 11:06 AM
To: Horton, Odell <ohorton@wyattfirm.com>
Cc: MMclaren <MMclaren@blackmclaw.com>; Brice Timmons <btimmons@blackmclaw.com>; Will Cochran <wcochran@blackmclaw.com>; Will Routt <wroutt@watsonburns.com>; Bill Burns <bburns@watsonburns.com>; btrammell@bakerdonelson.com; Craddock, Bob <rcraddock@wyattfirm.com>
Subject: Re: Depositions of the named Plaintiffs/Scheduling Order

Defense Counsel:

Can you let us know about availability dates and the Scheduling Order query I posed about experts?

Thanks

Frank L. Watson, III
Watson Burns, PLLC
253 Adams Avenue
Memphis, Tennessee 38104

Phone: (901) 529-7996
Fax: (901) 529-7998
www.watsonburns.com

On Jan 22, 2020, at 11:53 AM, Horton, Odell <ohorton@wyattfirm.com> wrote:

Frank:

We can't deposition Ed Raper next week. We are contacting Raper, Moore, Oldham and Hammons regarding availability. I will update you early next week, if not before.

Odell Horton Jr.

Wyatt, Tarrant & Combs, LLP
Direct: (901) 537-1082

From: Frank Watson <fwatson@watsonburns.com>
Sent: Wednesday, January 22, 2020 11:24 AM
To: Horton, Odell <ohorton@wyattfirm.com>
Cc: Mike McLaren <mmclaren@blackmclaw.com>; btimmons@blackmclaw.com; Will Cochran <wcochran@blackmclaw.com>; Will Routt <wroutt@watsonburns.com>; Bill Burns <bburns@watsonburns.com>; btrammell@bakerdonelson.com
Subject: Re: Depositions of the named Plaintiffs/Scheduling Order

Thats correct. Can we depose Raper any day next week, since we have those days marked off?

If not, when can we do Raper?

We would like to do Raper first, then the named plaintiffs, then Moore, Oldham, Hammons, Zigler and save the Rule 30(b)(6) for the last. By making the Rule 30(b)(6) the last Depo, we might be able to avoid the issues you seem to have with the topics without having bother Magistrate Pham.

Just let the plaintiffs' team know.

Frank L. Watson, III
Watson Burns, PLLC
253 Adams Avenue
Memphis, Tennessee 38104
Phone: (901) 529-7996
Fax: (901) 529-7998
www.watsonburns.com

On Jan 22, 2020, at 11:02 AM, Horton, Odell <ohorton@wyattfirm.com> wrote:

Frank:

I want to confirm the depositions of the named Plaintiffs scheduled for next week are cancelled.

I will send you comments regarding the proposed Scheduling Order later this week.

Thanks.

Odell

Odell Horton Jr.

Wyatt, Tarrant & Combs, LLP
6070 Poplar Ave., Suite 300
Memphis TN 38119-3907
Direct: (901) 537-1082
Fax: (901) 537-1010
Email: ohorton@wyattfirm.com

<image001.jpg>

Memphis | Nashville | Louisville | Lexington | New Albany | www.wyattfirm.com

<image002.jpg>

<image003.jpg>

<image004.jpg>

<image005.jpg>

=====

The information contained in this transmission is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you are not the intended recipient of this information, do not review, retransmit, disclose, disseminate, use, or take any action in reliance upon this information. If you received this transmission in error, please contact the sender immediately, destroy all printed copies, and delete the material from all computers.

=====

=====

The information contained in this transmission is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you are not the intended recipient of this information, do not review, retransmit, disclose, disseminate, use, or take any action in reliance upon this information. If you received this transmission in error, please contact the sender immediately, destroy all printed copies, and delete the material from all computers.

=====